



Contemporaneous Disclosure

Requirement: 18 C.F.R. § 358.7(a)

Date Posted: March 16, 2026

NorthWestern identified configuration issues in the iTOA Outage Management System (iTOA) that could have provided Marketing Function Employees (MFEs) in NorthWestern's Default Energy Supply group with visibility into non-public transmission function information associated with Talen Montana's interests in the jointly-owned Colstrip Units 3 and 4. Under the FERC Standards of Conduct, Energy Supply MFEs are authorized to view outage/derate information for NorthWestern owned and contracted generation resources, but not outage/derate details for third party facilities. The issue stemmed from how Colstrip assets were modeled and permissioned in iTOA. No evidence indicates that MFEs accessed or used non-public information; however, NorthWestern is posting this disclosure out of an abundance of caution and consistent with its Standards of Conduct.